



# Department of Environmental Quality

*To protect, conserve and enhance the quality of Wyoming's  
environment for the benefit of current and future generations.*



Matthew H. Mead, Governor

Todd Parfitt, Director

March 13, 2015

Ms. Gauri Gajewar  
Environmental Compliance Coordinator  
Denbury Onshore, LLC  
5320 Legacy Drive  
Plano, TX 75024

RE: Notice of Violation

Dear Ms. Gajewar:

Enclosed you will find a Notice of Violation (NOV) issued to Denbury Onshore, LLC by the Department of Environmental Quality, Air Quality Division, for the failure to maintain records and install the stack at the minimum height as required at the Hartzog Draw Compressor Station #2 located in Campbell County, Wyoming. These are violations of conditions 13 and 15 of permit CT-4333.

As the Department and this Division consider the failure to comply with air quality permit conditions to be a serious matter, I am considering recommending the Department refer this violation to the State Attorney General's office requesting a suit be filed in District Court to recover appropriate penalties. If you would like to discuss settlement of this Notice of Violation prior to referral to the Attorney General's office, please contact Ms. Ann Shed, Air Quality Compliance Program Principal, at 307-777-8601 no later than ten (10) days after receipt of this letter.

Should you have any questions or comments regarding this matter, please feel free to contact me or Ms. Ann Shed.

Sincerely,

Steven A. Dietrich  
Administrator  
Air Quality Division

cc: Fred DiLella  
Ann Shed  
Landon Brown  
Elizabeth Lyon  
Tanner Shatto



**BEFORE THE  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
STATE OF WYOMING**

<b>IN THE MATTER OF THE NOTICE OF VIOLATION</b>	)	
<b>ISSUED TO DENBURY ONSHORE, LLC</b>	)	<b>DOCKET NO. 5545-15</b>
<b>MS. GAURI GAJEWAR</b>	)	
<b>5320 LEGACY DRIVE</b>	)	
<b>PLANO, TX 75024</b>	)	

**NOTICE OF VIOLATION**

**NOTICE IS HEREBY GIVEN THAT:**

1. The Department of Environmental Quality, Division of Air Quality, has found Denbury Onshore, LLC to be in violation of permit CT-4333 issued in accordance with W.S. §35-11-801 of the Wyoming Environmental Quality Act and Chapter 6, Section 2 of the Wyoming Air Quality Standards and Regulations (WAQSR) for the Hartzog Draw Compressor Station #2 located in Campbell County, Wyoming.

2. W.S. 35-11-801(a) states, "In granting permits, the Director may impose such conditions as may be necessary to accomplish the purpose of this act which are not inconsistent with the existing rules, regulations and standards."

3. Chapter 6, Section 2 of the Wyoming Air Quality Standards and Regulations prescribes the applicability and procedures for issuing permits to sources under Wyoming's construction and modification permitting program.

4. Permit CT-4333 was issued to XTO Energy, Inc. on July 11, 2006 for the Mud Springs Compressor Station #2. This facility and applicable permits transferred to Ringwood Gathering Company, which then transferred to Denbury Onshore, LLC on or about December 1, 2012, at which time the facility name was changed from Mud Springs Compressor Station #2 to Hartzog Draw Compressor Station #2. Condition 13 of permit CT-4333 requires maintenance, monitoring and recordkeeping as follows:

(ii)(a) "The inlet temperature shall be recorded at least monthly ..."

(iii)(a) "The pressure drop across the catalyst shall be recorded at least monthly ..."

(iv) "Records of catalyst inlet temperature, pressure drop, and any maintenance or corrective actions shall be kept and maintained for a period of five (5) years and shall be made available to the Division upon request."

5. Condition 15 of permit CT-4333 requires "That the stack height for the compressor engines shall be a minimum of 2.2 times the compressor building height."

6. On September 11, 2014, an Air Quality Division Engineer/Inspector conducted an inspection of the Hartzog Draw Compressor Station #2 and noted that the catalyst inlet temperature and pressure drop were not recorded between September 2013 and September 2014. The inspector further noted that the stack height was about 1.7 times the compressor building height. Failure to maintain records for the facility is a violation of condition 13 of permit CT-4333. Failure to install the stack at the minimum required height is a violation of condition 15 of permit CT-4333.

7. Said violations consist of failure to maintain records and install the stack at the minimum height as required at the Hartzog Draw Compressor Station #2, which are violations of conditions 13 and 15 of permit CT-4333.

8. Under W.S. 35-11-901(a), any person who violates any provision of Article 2 of [the Environmental Quality Act] ... or any rule, regulation, standard or permit adopted pursuant to those provisions, or who violates any determination or order of the council pursuant to Article 2 of [the Environmental Quality Act] ... is subject to a penalty not to exceed ten thousand dollars (\$10,000.00) for each violation for each day during which the violation continues, a temporary or permanent injunction, or both a penalty and an injunction.



9. This notice is being sent to you pursuant to W.S. 35-11-701(c), which requires that, in any case of the failure to correct or remedy an alleged violation, the Director of the Department of Environmental Quality shall cause a written notice to be issued and served upon the person alleged to be responsible.

DATED this 13<sup>th</sup> day of MARCH, 2015.



Steven A. Dietrich  
Administrator  
Air Quality Division



Todd Parfitt  
Director  
Department of Environmental Quality

Please direct all inquiries to Steven A. Dietrich, Administrator, Division of Air Quality, Department of Environmental Quality, Herschler Building, 2nd Floor, 122 W. 25th Street, Cheyenne, Wyoming 82002. (Telephone: 307/777-7393.)